

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,)	No. CR19-159 RSL
Plaintiff,)	
v.)	MOTION TO PERMIT
PAIGE THOMPSON,)	OUT-OF-DISTRICT TRAVEL
Defendant.)	Note for: June 30, 2023

Paige Thompson, through counsel, respectfully requests that the Court permit her to travel to Las Vegas from August 9, 2023 until August 13, 2023 so that she can attend the DefCon information security conference.

The probation office and the government oppose this request.

I. PROCEDURAL HISTORY

On October 4, 2022, this Court sentenced Ms. Thompson to five years' probation, with a special condition of home detention for three years, following her conviction for wire fraud and violations of the Computer Fraud and Abuse Act. Although the probation office has expressed concern that Ms. Thompson has yet to find employment, Mr. Thompson has had no violations of her probation. (Ms. Thompson similarly had no violations while on pretrial supervision for over two years.)

II. MOTION

Ms. Thompson requests the Court to permit her to travel to Las Vegas, Nevada, to attend the DefCon information security conference with her roommate who will be working at the event. The conference will be held at three different hotels and attended

1 by information security professionals from August 10–13. Ms. Thompson proposes that
2 she would fly to Las Vegas on August 9 and return August 13. The event provides an
3 excellent opportunity for Ms. Thompson to meet and network with professionals to
4 augment her job search. Ms. Thompson attended the conference last year without
5 incident. She found the conference informative as well as productive in terms of job
6 leads, although the leads ultimately did not lead to employment. Ms. Thompson's
7 airfare, hotel, and expenses will be paid for by her roommate, who plans to attend the
8 conference.

9 If the Court permits Ms. Thompson to travel, she will provide detailed
10 information to the Probation Office, including the specific address of the venues, the
11 hotel at which she will be staying, as well as all flight information. Ms. Thompson is
12 waiting for this Court's decision before purchasing airline tickets for this trip, and thus
13 specific details about the flights and hotel are not yet available.

14 For the foregoing reasons, Ms. Thompson requests that the Court grant her
15 permission to travel to Las Vegas, Nevada, to attend the DefCon conference leaving on
16 August 9, 2023 and returning August 13, 2023.

17 DATED this 22nd day of June 2023.

18 Respectfully submitted,

19 *s/ Nancy Tenney*
20 Assistant Federal Public Defender
21 Attorney for Paige Thompson
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